

EXHIBIT B

Patrick Murphy

From: Patrick Murphy
Sent: Sunday, February 11, 2024 11:51 PM
To: Paula Colbath
Subject: MineOne Needs to Produce its WeChat Messages (RFP #4 and #6)
Attachments: Attachments.html

Paula:

Despite your representation to Judge Rankin at the February 8 meet informal discovery hearing that Defendant MineOne has already “fully responded” to BCB’s Request For Production No. 6, (where BCB requested MineOne to produce all its communications (including text messages, WeChat, WhatsApp, Discord, Telegram, or any other mobile or social messaging applications) between Jiaming Li, Erick Rengifo, Huali Zhang, Lucas Wang, Ziyao Shao, Iris Li and Haku Du involving the North Range Project, the Campstool project, and the planned expansions at both sites, MineOne did not produce **any** of its WeChat messages. Instead, you told me and the Court that, “We are consulting with our clients on this issue as there are a number of Chinese privacy laws at stake.”

But you never told us what those Chinese privacy laws are, or what they say. Not that Chinese law would matter here: The North Range site is in Cheyenne, Wyoming, and this lawsuit is in the United States District Court. Chinese law does not apply here.

We know you clients have WeChat messages – a lot of WeChat messages, maybe hundreds -- responsive to Request For Production No. 6. BCB does not have a lot of your clients’ WeChat messages, but BCB has some of your clients’ WeChat messages. Here, attached, are examples of your clients’ WeChat messages relating to the North Range and Campstool projects, expansion, hiring, and O&M Service provider.

In a full response to BCB Request for Production No. 6, I expect MineOne to produce *all* of its responsive WeChat messages by February 18, 2024.

We also expect MineOne to produce all its WeChat messages with Bitmain in response to BCB Request for Production No. 4. We know MineOne communicates with Bitmain on WeChat. As just an example, please see Yiliang Guo’s December 8, 2023 Declaration (Doc. 82-2) where Mr. Guo swears as follows:

“On November 21, 2023, at 1:53 AM Hong Kong Time, Ms. Lianfei (Haku) Du, an operation manager of MineOne Partners LLC, an affiliate of MineOne, and my usual contact at MineOne, left me several WeChat voice messages, alerting me that Bitmain Technologies Georgia Limited (together with its affiliates, “Bitmain”) was named along with MineOne as a defendant in a lawsuit filed by Plaintiff BCB Cheyenne.”

We expect MineOne to produce all its WeChat messages that are responsive to BCB Request for Production No. 4 on or before February 18.

Thank you, Paula.

Pat Murphy
Counsel for BCB Cheyenne LLC d/b/a Bison Blockchain

Citrix Attachments

Expires August 9, 2024

2023_01_17-30_HiringForBitOrigin_WileyZhang.pdf	1.8 MB
2023_02_2025_WeChat_O&M_Team.pdf	1.3 MB
2023_04_17_WeChat_Hiring_WileyZhang.pdf	1.5 MB
2023_04_28_WeChat_Hiring_Wiley_JackZhu.pdf	1.6 MB
2023_05_11-13_WeChat_Expansion_Gro..._MW.pdf	1.7 MB
2023_05_11-13_WeChat_ExpansionPlans.pdf	1.4 MB
2023_12_03_WeChat_WileyZhang_JackZhu.pdf	1.5 MB

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